

Exhibit J to Ferber Declaration

SUMMARY OF STATE PROPERTY

As indicated from text on the title screen, *State Property* is “inspired by true events.” It tells the story of Beans who, from the beginning of the story, is willing to use whatever violent means are necessary to make money for himself and his gang. He is not content to play by the rules set by the established drug dealers and offers his competitors a stark choice: cut in his gang or die. While he sees himself as a family man, this propensity for violence spills over into his personal life. After threatening two other established drug dealers, they kidnap his girlfriend, kill her friend and demand ransom. While she is eventually released, her exposure to violence changes her view of his lifestyle and she pushes him to stop his drug dealing. Beans, however, cannot leave his violent ways behind and tries to kill the men who kidnapped her. In the end, Beans’ willingness to commit violence, even when it is not necessary, leads to his undoing. A small time drug dealer whom he had shot five times for doing business with a rival dealer survives and becomes a witness against Beans. Beans is arrested and sentenced to life in prison.

State Property opens with a voice-over narration from Beans while showing a photograph of his five person crew from Philadelphia.

The opening scene takes place in a strip club with Beans and Baby Boy talking about how they are wasting their time loafing around when they could be making real money. They decide to start selling drugs and recognize that their plans for breaking into the drug business depend on their ability to inflict violence.

Just then, they see Blizz, a guy they know from the neighborhood, walk in to the strip club and shoot somebody at the bar. Beans and Baby Boy decide he would make the perfect addition to their gang. They see him later on the street and Blizz shoots at them before he recognizes them. Once that is straightened out, Beans asks him to join the gang and he accepts.

That Beans is embracing violence to expand his drug business is apparent from the beginning. Only a couple of weeks after starting to sell drugs, Beans hears from P-Nut, one of his gang members, that business is slow because of another local dealer, Futch. Beans goes to see Futch who demands respect and says that this is his turf. Without provocation, Beans then beats Futch with a bat. When Futch says that there are “rules to this,” Beans makes it clear that his gang will not be following them by further beating him and having him thrown into a dumpster. As narrator, Beans says that this is the beginning of his takeover.

The story skips to a year later with Beans talking to his girlfriend, Iesha. Iesha came from shopping with Tanya, who had asked her to go out to a club. They talk about her going to a club. Beans is jealous but says everyone knows what “belongs” to him.

Meanwhile, Beans continues to encroach on the territories of other dealers through violence. Beans, accompanied by other members of his gang, goes to talk to three street

dealers who have been buying drugs from another supplier. Beans tells one of them that he has a chance to “get down with them.” The dealer refuses and runs away; straight into the arms of another member of Beans’ crew, who shoots him. The other two street dealers immediately start buying from Beans when he demands that they “Get down or lay down.”

The next scene features a voice-over narration during Beans’ daughter’s fifth birthday, which is being thrown at Beans’ new house in the suburbs. While Beans sees himself as a family man, his business intrudes even during his daughter’s party. Iesha confides in her girlfriend that Beans should be spending more time with the family; he thinks that providing for them financially is enough.

During the party, Beans meets with his gang introducing a new member, D’Nice. Beans states that the gang—apparently comprised of six key members now—is called “ABM,” for “All ‘Bout Money,” and is the new Black Mob.

Beans continues to use violent means to encroach on the territory of other dealers. He makes an offer to Butter, a rival drug dealer, to be a captain in his organization. When Butter asks why he would possibly be interested in that, Beans says he should be if he wants to live. His choice is to “get down or lay down.” When Butter refuses, Beans says that he is coming after him.

The propensity for violence is not limited to rival dealers; Beans also uses violence to keep his own gang in line. When one of his crew talks back to him, Beans shoots him in the finger. Beans feels no remorse for his actions and believes they are completely justified.

Nor does Beans show any concern for innocent civilians who may get caught up in his war with other drug dealers. Four members of ABM go to a crowded basketball game and start shooting Butter and three of his gang members, killing them all.

In a voiceover, Beans talks about how his gang is expanding and taking over the territories of other drug dealers in the city; Baby Boy is shown bribing two police officers.

Beans starts to have a problem with his supplier who says he has to wait a week before getting the next shipment. Beans decides to go to Miami with Baby Boy to find a new supplier. In Miami, Beans and Baby Boy go to the supplier’s house to make the exchange. Beans is nervous and refuses the supplier’s offers of hospitality. Beans then tells Baby Boy that they are cutting out the middleman and have to be careful that the supplier does not kill them and take their money. During the transaction, Beans asks the supplier to speak in English to his men; not the “gualla, gualla.” The deal is completed after the cocaine is tested; one of the supplier’s men says that it is 100% pure cocaine.

Back in Philadelphia, Beans faces threats to his authority from Shareef, a new drug dealer, as well as from his own gang. One of the members of ABM, Blizz, starts

asking why it is that Beans makes the real money when everybody else does the work. When Beans is told of this, he asks that another member of ABM keep a close watch on Blizz.

Consistent with his past actions, Beans sees an opportunity to violently resolve both of these problems. He has Blizz pick up Shareef's girlfriend and has her set up Shareef. After Blizz kills Shareef, the police immediately arrive and shoot Blizz. While Beans and Baby Boy are buying diamond jewelry from a jeweler named Eli, played by Jacob Arabo p/k/a "Jacob the Jeweler," who comes to Beans' house, Beans tells Baby Boy that he set up Blizz.

The next scene takes place by Beans' pool with him addressing his gang, which now appears to be comprised of nine members. Beans talks about how they have taken over the city and can enjoy the "fruits of their f---ing labor." They have lost a lot of "soldiers," some at war and some because they were disloyal. Beans demands that they reaffirm their loyalty. Beans gives diamond rings to his top three lieutenants.¹

Beans sees the more established drug dealers as complacent and he starts muscling his way into their territory as well. The ABM gang starts killing other drug dealers to rob them of their money and drugs. When Beans calls "Boss Dame" (played by Damon Dash) to try to work out a resolution, Beans is dismissed as insignificant.

Again, Beans immediately turns to violence even where it may be avoided. Beans calls Cesar, a small time drug dealer who owns a store selling car accessories, to set up a meeting for a business proposition. Cesar is nervous about the meeting and tells Beans when he comes that he already received an offer from Boss Dame. Cesar asks for more time to decide who he is going to work for. Beans shoots him five times and says "if you ain't with us, you're against us."

Cesar survives the shooting and Boss Dame speaks to one of his men about how Cesar may testify against Beans. Cesar is later pressured by the cops to serve as a witness against Beans.

Boss Dame and his crew are out at a club and see Iesha and her girlfriends. Boss Dame knows Iesha is with Beans and is intentionally disrespectful of Beans. Boss Dame later meets with Untouchable J (played by Shawn Carter), and they plan to kidnap Iesha that night.

As Iesha and her girlfriend leave the club to go to their cars, four men kidnap them. Boss Dame calls Beans, tells him that Iesha has been kidnapped and demands \$500,000 in ransom. Beans agrees and then Dame shoots Iesha's girlfriend while Beans is still on the phone. Beans pays the ransom and Iesha is released.

¹ Unlike the rings in the Plaintiff's book, these rings don't have the initials of the gang.

Iesha's kidnapping makes her reevaluate Beans' life of crime and she asks him to get out. Iesha says that they have enough money and she wants their daughter to have a father.

While Beans is also increasingly concerned about his legal troubles, he is unwilling or unable to leave his life of violence behind. Beans goes to a strip club and starts shooting as soon as he sees Boss Dame, but nobody is hit. Boss Dame talks to Untouchable J and they agree to take care of Beans.

Meanwhile, the legal pressure on Beans intensifies; the police crack down on the ABM gang and make multiple arrests disrupting their business. Beans is eventually arrested by DEA agents at his home.

After being told by his attorneys how weak his case is, Beans tells them to offer Cesar five million dollars. Cesar takes the money, but Beans asks one of his men to kill him anyway.

At the trial, Baby Boy and D'Nice sneak in with guns, kill the guard and then Cesar. A shootout ensues with multiple people shot; Beans is eventually shot in front of Iesha and his daughter by Untouchable J's girlfriend. Beans says in a voiceover that he went out like a gangster; then says that only happens in the movies. In reality, Beans gets "quadruple life" and says that he is now "State Property."

Exhibit K to Ferber Declaration

Junior Black mob
registration number: 122248

JUNIOR BLACK MOB

by

ERNEST "TRON" ANDERSON

Registered: WGA WEST

9/17/98

FIRST DRAFT

JUNIOR BLACK MOB

WRITTEN BY

ERNEST "TRON" ANDERSON

This is a story, which entails some actual and factual events that have taken place according to the files of the F.B.I. Part being the Junior Black Mafia. A squad that consisted of at least twenty six ruthless and dangerous members.

The Junior Black Mafia or should I say from this point forward, J.B.M. this is what the world new them as. J.B.M was started in Philadelphia in or around late 1985 and spread through the tri-state area which consisted of Philly, Jersey and New York it was said to have ended in or around September 1991. It was also alleged that they made somewhere in the sum but not limited to 56,795,000 in their six year rein. In order to do so JBM had to move somewhere in the excess of five hundred kilograms of cocaine a week.

When you become that major of a player you raise the expectations of your connect and when you do that he doesn't want to hear you had a slow week you have to maintain that pace and if you can't then someone will come visit you in the middle of the night. So JBM adopted a motto which was "Get down or lay down." Interpreted means, Get down with JBM and buy drugs from them or lay six feet under by JBM. They put their motto cards on the cars of other players through out the city. They were a intimidating force so people took heed, for others orders were carried out for them to be killed (laid down).

The message rang clear to everyone in every part of the city except for South Philly there was one squad that didn't want to bow down to JBM. This caused a all out war through out the city causing a lot of innocent people to be killed even little children. There was even a shoot out in our City Hall that carried out into the busy streets of down town Philly. So JBM and its rivals made constant headlines. Another known rival was the greatly feared Jamaican shower posse, shower posse because of the way they killed their victims with showers of bullets. To no avail the Junior Black Mafia was just to vicious. This of course made it that much harder for anyone not have to get down with JBM. The JBM virtually had the city on lock down, except South Philly they just didn't take kindly to the way the JBM did business. South Philly itself is very mob oriented, but on a more professional, business aspect, if there is such a thing.

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The saga begins, it's a cloudy summer afternoon but everyone is in their fly gear as it's the first summer league basketball game in the heart of North Philly. Where it is rough as hell, it's so rough the visiting team has to wear bullet proof vest as their jerseys. Girls are coming in packs with their tightest see through outfits on and every year the outfits get a little more tighter and a little easier to see through. This of course brings the hustlers out in packs. The opening game is between home team favorite is 16th street and their star player is one of North Philly's major players, his name is Butter. Unbeknownst to his teammates Butter was approached earlier in the week by some members of the JBM. He was ordered to get down or lay down. Now don't get me wrong Butter had a nice little squad his self, he was making some where in the area of a 100 thousand a week. So he told them they would have to see him on the streets. Butter wasn't willing to work with them and damn sure wasn't working for them. So we are near the end of the game when this all black convertible Saab pulls up and behind it a all black Pathfinder with the windows tinted and a tire cover on the back that reads JBM

Andrew Johnson better known as AJ gets out of his car along with four of his hit men and head for the basketball court Butter peeps what's coming at him out the corner of his eyes. As the four hench men step onto the court. The time clock reads five seconds. Butter runs for the Ale' oop he dunks the ball the crowd goes wild. He continues to hang on the rim and reaches around to the backboard and pulls a gun that is secured to the backboard and comes down shooting.

Bullets are flying everywhere a couple of AJ's boys get hit Butter gets hit, his squad members get lit up it's just all out war. AJ just stand in the cut and watches. By the time it's all over with Butter and four others lay dead on the court. AJ jumps into his Saab and spins off. By the time the cops arrive AJ and his squad are gone.

The JBM was set up like the military and divided into sections. North Philly, West Philly, South West Philly, Mt. Airy and South Philly. Each section had it's captain and lieutenant. AJ would only deal with the captains from each section or squad. Each squad was responsible for the sale and distribution of drugs within a specified geographic area.

There was also a team of runners who made sure that everyone got there drugs. These guys made a lot of money also all the running they had to do. The runners took plenty of risk. Large runs were especially dangerous.

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Steve a/k/a Baby boy and David a/k/a D-nice were AJ's best runners. Approximately June 1987, Baby boy and D-nice would and did travel to Florida for the purpose of picking up ten kilograms of cocaine from their Florida connect.

When Baby boy and D-nice drove down to Florida for the first time they didn't know what to expect. What they did know is that if anything went wrong or didn't go the way AJ said it should that they were going to kill somebody. The Mercedes Benz that they drove down in was equipped with secret compartments that would hold up to 100 kilograms of cocaine. The steering wheel had a secret compartment to hold a 9mm. semi automatic handgun and in the door was a compartment stored with a tek 9mm. semi automatic handgun switched to fully automatic. This is the first time that the runners have met the Dominican connect and this makes for a uncomfortable meeting. The runners are lead to a warehouse. Here they drop off a briefcase carrying 100 thousand dollars and get a shopping bag containing 10 kilograms of cocaine.

D-Nice has his finger on the trigger about to cut loose on anybody who moves wrong. The same with the Dominican boys these niggas don't play, Dude looked so pissed you would think he swam here from Cuba. After it is tested and all is well Baby boy and D-Nice roll out. They make their way back home but not before they both relieve themselves.

In every organization there are key players. Taking the word organ from organization. Then using one of the most important organs of the body the heart. The heart signifies power and strength. That's why this organ or muscle is so important. As true for any organization, without heart or muscle you are nothing.

The muscle or enforcers for JBM were no joke. They were seven of the deadliest niggas around. Granted each squad had their own set of enforcers. These guys worked for AJ, their job description was committing and threatening acts of violence for the purpose of controlling, expanding and protecting the drug business of the JBM and get this, maintaining internal discipline. So if someone inside got to big and wanted to branch off and do his own thing, AJ would send in the enforcers to silence that type of insubordination. AJ was willing to protect his drug enterprise at all cost, even if it meant getting rid of the three people who started JBM.

In West Philly there was a situation where this outside player was trying to take over this small section of West-Philly called the Bottom. The captain who controlled this section of town couldn't handle it, so AJ sent his Lieutenant General to straighten this situation out. There were four Generals each assigned their own section of town.

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Just so they are able to monitor the captains in that part of town. In this case AJ allowed the outside player get away with as much as he did in order to eliminate a bad seed which was his partner and friend Braheem. It was rumored that Braheem was talking of starting his own organization. AJ caught wind of this so the process of elimination started. Braheem would have to handle this this outside player because his weekly bring in was suffering. Braheem called a meeting with the outside player in order to has a somewhat peaceful resolve. Shareef, the outside player was very hot headed and disrespectful. That meant war, Braheem got to him through his girl. A typical dbg, a drug boys girl these stank hoes would tell on their mommas for a shopping spree, not just that Shareef had just got caught fucking her sister. The girl got Shareef to take her home and on the way there she was to page Braheem and put in the numbers 319 which spells die when you turn your pager around. Mind you it's daylight and her block is filled with kids this leaves a false sense of security to Shareef who doesn't see it coming. Once he pulls the car up to the girls house no sooner then he puts his car in park here comes the hit. In broad daylight Shareef and the girl are killed by Braheem. This makes Braheem hot as a firecracker he has to go on the run. Braheem looks to AJ for help once he has exhausted his money. By this time AJ wants Braheem caught. In a effort to find Braheem the police are raiding allot of AJ's money spots. Unbeknownst to Braheem, AJ was having someone tip the police to Braheem's whereabouts. When the police go into arrest Braheem he doesn't go easy. He gets into a gun battle with police in which he ends up being shot in the shoulder and in the hip.

AJ of course wanted him dead but none the less the bad seed is out of his way. Sometime between late 1987 and mid 1988 Andrew Johnson would and did exercise exclusive leadership of the JBM. AJ's Florida connect was beginning to dry up so AJ begin to meet with some cocaine suppliers in California and elsewhere. At this point AJ was bringing in a ton of money and was spreading it around. AJ brought every high ranking member a gold ring with the letters JBM filled with diamonds. AJ gave lavish parties with a host of celebrity guest. He had become a very loved, respected but yet very feared man. Men wanted to be him, women wanted to be with him.

The police on the other hand had something totally different in mind. To this point they really didn't have anything substantial to stick and hold AJ. So all they can do is sit back and watch and hope that he will make a mistake. The killing and drug dealing continue.

Meanwhile, AJ bumps heads with a player that he knew was getting plenty of money and had a section of town that he

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wanted, South Philly. Boss was the player who wouldn't bow down to AJ.

This did not sit well with AJ, A new war was in the making. In order to expand its control of the drug business, the JBM would and did murder, attempt to murder members and associates of a rival drug organization headed by Ronald "Boss" Gaynes. Boss began to step to associates of the JBM who were forced to get down with them. He offered them lower prices for cocaine and restored control of their own business again. So this made Bosses organization stronger also more aware of the inner operations of the JBM. AJ was pissed he launched a all out attack on Boss and all of his associates.

The night was February 2, 1989, we visit club Revolve in South Philly. Baby boy was at this club and sees Devon a associate of Boss, he makes a call to AJ who puts out a call to his hit squad. Within one half hour the hit squad is there fully armed. A couple of the guys go inside the club, Devon knows something is going on but doesn't know what, just then a couple of shots ring out. This starts a stampede everyone runs outside the club. Devon tries to make his way through the crowd to his car, he feels a punch from behind this makes him do a slow off balance run then another kick to his leg as he gets to his car then his body begins to heat up as we see seven men walking towards him all with automatic weapons firing. All of a sudden lights out for Devon, as he lays presumably dead. No one really saw anything except Devon. He got shot somewhere in excess of sixteen times from head to thigh.

Not even two weeks later the morning of February 15, 1989, Manny another associate of Boss, is out going to one of his crack houses to make a pickup. Manny is approached by this grungy, stink piper looking dude asking him can he wipe off his car for a couple dollars. Manny agrees as he walks into the house to get his money. The guy proceeds to wipe off Manny's cream Jaguar. Manny comes out counting his money and balls up a five dollar bill and throws it to the piper looking dude, yells out "Catch" as the five is in the air D-nice pulls out his gun and yells out "No you catch" and empties his 9mm. clip into Manny he picks up the five dollar bill and puts it into his pocket and spits on Manny and calls him a cheap mother fucker as he walks off with his bucket filled with car washing utensils.

The war seemed to be going more in AJ's favor but AJ still didn't have South Philly. It was on or about February 21, 1989, that AJ called a meeting with a associate of of Boss named C-zer who controlled a nice part of South Philly. See AJ figured if he could just get his feet wet in South Philly he could eventually lock it down. C-zer excepted the meeting

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with AJ and his upper eschalon members of JBM these guys weren't known for pulling triggers also they were meeting at his detail shop so C-zer felt comfortable with this meeting. After he searched and found that they had no weapon, the meeting ensued. C-zer wanted to know what AJ had to offer. AJ wanted to know to what extent his dealing with Boss was. Get down or lay down is what AJ spit out of his mouth as he began to walk towards a Mercedes Benz that was mentioned in the earlier scene, this caught C-zer by surprise. C-zer tried to make it to his gun but not before AJ pushes the button to the secret compartment that opens to reveal a Oozi type gun. AJ began shooting C-zer, who at this point tried to get away as he lay on the ground in a pool of blood, AJ stood over him and said "I guess you choose to lay down and AJ shot him again. Presumed dead AJ and his crew left the detail shop. That unsuccessful hit gave the law the break they've been waiting for, now they had a eyewitness, someone who wasn't afraid to testify. Boss stepped his game up a little and kidnapped Iaasha, AJ's BM (Babies Mom) and demanded two hundred thousand dollar and fifty kilograms of cocaine. Besides his money Iaasha was AJ's heart his woman and kids meant the world to him. Until this point he tried to keep her away from the business.

The message that was sent with the money was to take this money because you'll need it to bury your mother. Everything was on the up and up with the exchange of the money for the girl. AJ wasn't going to chance the safety of Iaasha. After she came home the kids, Iaasha and AJ went on vacation to Cancun Mexico, well it was part business. Here we see AJ in a different light with his other family we see AJ the father. After family time AJ met with a new connect who would be able to supply his demand. AJ was moving up to about five hundred kilos a week.

Back in Philly it was business as usual, the city was in constant terror because of the rash of violence and mayhem. Unbeknownst to Boss that AJ was out of town he got a call that AJ was at his favorite restaurant Mom and Nems eating. Boss immediately sent a squad to make sure that was the last meal AJ would ever eat. This AJ look a like didn't know how deadly his looks were. Enjoying all the perks that looking like Andrew Jackson could bring, women, respect and free shit and a barrage of bullets that would soon end this married with children, hard working, Army Vet's life.

The city wanted justice, how many more innocent lives would be lost in this senseless drug war? The state was building it's case against JBM, they didn't want to do anything wrong because it was obvious JBM could afford the best lawyers. The FBI planted a agent to infiltrate the organization.

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On or about March 20, 1989, Boss had to go to court for a drug case he caught a few months back at this time they didn't have the metal detectors in City Hall so Boss had his hammers on him at the time. When he got to the ground floor he was met by three of AJ's hit men, Boss pulled out his two 9mm. pistols and the shoot out began right in City Hall, shots rang out in Down town Philly this was a scene right out of a movie shooting running between moving cars. The cops gave chase and Boss and the three assassins directed their gun fire to the police. A couple cops got hit but nothing major, Unbelievably no one got caught. It is clear that these guys had no respect for the law.

Boss would seem to have nine lives to go along with his two 9mm. pistols. The summer came an as it got hot the streets got hotter, the cops started bringing people in on charges. The second week in July the Greek Picnic comes to Philly. The actual picnic is held at the Belmont Plateau. Thousands of people flock to the Plateau, guys checking for girls and vise versa. This year the picnic turned out a little different. In the middle of the Fraternity step show, two quads come barreling through the crowd trying to get at E-wok who was suspected of playing both sides of the fence.

Boss and AJ had ran into one another in Las Vegas at the Sugar Ray Leonard and Tommy Hearns 2 fight. The guns had to be left in Philly. AJ spotted Boss in the Gucci shop buying sneaks for him and his squad their was about five guys with Boss. AJ's squad was about twenty deep. Advised not to say anything to Boss because they were out of town and being black and in Vegas didn't make a good combination. AJ of course didn't want to hear that. He approached Boss an told him to bow down to AJ, Boss turn and hit the shit out of AJ Boss then got rushed by twenty niggas stabbed multiple times with ink pens and thrown through a display case. His squad was out numbered, so them punk ass niggas stood back and watched. Then Boss watched their asses as his plane took off with his bitch ass squad left behind. Boss was losing the war but he kept fighting, he didn't go out like a bitch.

AJ was brought up on charges for the attempted murder of C-zer, they finally thought they had him. Bail was denied so AJ had to stay in until his trial. AJ had made quite a few enemies, like his partner and good friend Braheem, so he took protective custody. Mean while on the streets with AJ gone and everybody thinking he wasn't coming home because they had a untouchable eyewitness. Money that was owed on the streets got spent, this power hungry monster made enemies in his own crew. AJ sent a million dollars to C-zer for him not to talk, C-zer agreed.

Court day downtown was in total chaos you would think the president was in town, the way they had downtown blocked

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off. There was a motorcade, swat teams on the roof, television reporters a media frenzy and a host of family, friends and enemies. When a bullet proof vested and shackled AJ stepped from the prison van there were cheers and boos, as he produced a sinister grin to the television camera, while armed guards escorted him to the courtroom. Tension mounted in the courtroom as D-nice sat next to C-zer's mom with a 9mm. stuck in her side. They searched everyone but due to size of the crowd they weren't able to search everyone with efficiency, so D-nice dressed like a reverend with his gun tucked away in his gutted out bible was able to get by without detection besides would you think that these common street thugs would have the brains or balls to pull this off?

C-zer thought he had everything figured out. The million dollars was already put up, so. C-zer took the stand and when the prosecuting attorney asked the question. "Is the man here who shot you?" C-zer answered "yes" The attorney asked. "For the record would you point to him." C-zer looked at mother as she nodded her head yes, C-zer smiled as to say I won mother fucker and pointed to AJ, there was a loud cheer, then a shot rang out and C-zer's mom lay dead. The Reverend stood up and pointed the gun at C-zer and fired striking him once in the shoulder. Then turned the gun on his self and yelled out "JBM forever" and fired. AJ lowered his head in submission. This was the end of his run. The chyron reads what AJ was charged with and the amount of time he received and what all the other existing members received.

THE END, OR NOT